

EXHIBIT 1

Title: Urgent Complaint – Regulatory Violations & Registration Misconduct

Entity: Broker Solutions Inc. d/b/a New American Funding

Filed With: Pennsylvania Department of State

Submitted By:

Audury Petie Davis

Authorized Representative

Federal Case No. 1:25-cv-690-PJC

FHA Case No. 446-6285091

From: mfmallah87@icloud.com
Subject: Urgent Complaint: Broker Solutions Inc. (New American Funding) –
Regulatory Misconduct & Insurance Non-Disclosure
Date: Jun 25, 2025 at 9:55:03 AM
To: consumer.services@dfpi.ca.gov

Dear DFPI Consumer Services,

Please find attached a formal complaint against Broker Solutions Inc., doing business as New American Funding, regarding serious regulatory misconduct in connection with a federally backed FHA loan.

This complaint includes:

- Mishandling of sensitive borrower documents off-portal
- Failure to release appraisal and FHA case number
- False statements to regulators (CFPB and HUD)
- Potential concealment of this litigation from their E&O insurance carrier
- Unlawful business activity in Pennsylvania without updated registration

I am the Authorized Representative for the borrower and have filed federal lawsuit Case No. 1:25-cv-690-PJC. Additional supporting documents (emails, recordings, screenshots) are provided in the attached file and Dropbox folder.

I respectfully request that DFPI initiate an investigation and

coordinate with all relevant oversight and insurance bodies.

Sincerely,
Audury Petie Davis
Authorized Representative
Phone: 717-424-8220
Email: mfmallah87@icloud.com



Audury Davis
dropbox.com

Sent from my iPhone

EXHIBIT 2

Title: Regulatory Complaint – Failure to Amend Registration After Federal Litigation

Entity: Broker Solutions Inc. d/b/a New American Funding

Filed With: Pennsylvania Bureau of Corporations

Submitted By:

Audury Petie Davis

Authorized Representative

Federal Case No. 1:25-cv-690-PJC

FHA Case No. 446-6285091

From: mfmallah87@icloud.com
Subject: Regulatory Complaint: Broker Solutions Inc. (New American Funding) –
Failure to Amend Registration After Federal Litigation
Date: Jun 25, 2025 at 9:52:28 AM
To: RA-STBE@pa.gov

Dear Pennsylvania Department of State, Bureau of Corporations and Charitable Organizations,

Please see the attached urgent complaint and supporting evidence regarding New American Funding (Broker Solutions Inc.), who is currently operating in Pennsylvania while concealing active federal litigation and failing to amend its registration records.

I am requesting immediate regulatory review and appropriate investigation. My full contact information is listed in the attached complaint. I am available for follow-up and can provide all supporting documents digitally.



Audury Davis
dropbox.com

Respectfully,
Audury Petie Davis
2041 Greenwood Street
Harrisburg, PA 17104
Phone: 717-424-8220
Email: mfmallah87@icloud.com
Sent from my iPhone

EXHIBIT 3

Title: Urgent Complaint – Regulatory Misconduct & Insurance Non-Disclosure

Entity: Broker Solutions Inc. d/b/a New American Funding

Filed With: California Department of Financial Protection & Innovation (DFPI)

Submitted By:

Audury Petie Davis

Authorized Representative

Federal Case No. 1:25-cv-690-PJC

FHA Case No. 446-6285091

From: mfmallah87@icloud.com
Subject: Urgent Complaint: New American Funding (Broker Solutions Inc) –
Regulatory Violations & Registration Misconduct
Date: Jun 25, 2025 at 9:46:18 AM
To: scams@attorneygeneral.gov

To Whom It May Concern,

I am submitting this formal complaint against Broker Solutions Inc, doing business as New American Funding, for serious violations related to corporate registration, failure to file necessary amendments, and potential fraud involving state and federal compliance.

This company is currently named in active federal litigation under Case No. 1:25-cv-690-PJC (U.S. District Court for the Middle District of Pennsylvania). I am the Authorized Representative and Co-Plaintiff in the case. Despite being sued in March 2025 and named in multiple federal filings, no registration amendments or updates appear on file with the Pennsylvania Department of State as of June 2025.

I personally visited the Department of State office and obtained the most recent amendment, dated May 2024. No filings exist for 2025, and no disclosures reflect the pending federal case, recent consumer complaints, or regulatory exposure. This appears to violate statutory requirements for transparency and ongoing registration compliance under Pennsylvania law.

Additionally, the company:

- Submitted FHA loan documents and appraisals off-portal and outside of secure systems;
- Failed to respond to legal preservation notices (with bouncebacks);
- Lied in response to a formal CFPB complaint (Case No. [250614-21547383](#));
- Has not disclosed this litigation to its E&O insurer, based on evidence and follow-up;
- Is continuing to operate without accurate public disclosures.

These omissions raise serious concerns of corporate misconduct, insurance fraud,

and state registration violations.

I respectfully request the Department of State and the Attorney General's Office:

1. Investigate this entity's compliance with PA registration and disclosure laws;
2. Determine whether their E&O insurer and regulatory bodies have been properly notified;
3. Take enforcement or administrative action to ensure the company cannot operate in Pennsylvania while concealing federal litigation and noncompliance.

Attached are documents and screenshots available upon request, including:

- Business registration filings (May 2024)
- Federal court docket and exhibits
- Voicemail from NAF loan officer admitting to off-portal handling
- CFPB complaint and response records
- Evidence of failed communication and document handling

Thank you for your attention to this matter. I am available for follow-up or to provide additional evidence.

Respectfully,

****Audury Petie Davis****

Authorized Representative

2041 Greenwood Street

Harrisburg, PA 17104

Phone: (717) 424-8220

Email: mfmallah87@icloud.com

FHA Case #: 446-6285091



Tap to Download
Registered Agent .pdf
10.8 MB

<https://www.dropbox.com/scl/fo/wg5gfjfmhthc07w2cisk/AJBh0iAKorVVk2MBnXTJq3w?rlkey=lzrlie7ffjbphhar2t0gelpz0&st=30k6zbns&dl=0>

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA

Audury Petie Davis, Authorized Representative
on behalf of Maryann Butler,
Plaintiff,

v.

New American Funding
(Broker Solutions, Inc.),
Defendant.

Civil Action No. 1:25-cv-690-PJC

EXHIBIT 4

Registered Agent & Department of State Filing Record

This exhibit contains official documentation from the Pennsylvania Department of
State

identifying the registered agent and business registration details for Broker
Solutions, Inc.

d/b/a New American Funding. It is submitted in support of Plaintiff's Verified
Complaint

and Judicial Notice filings.

**PENNSYLVANIA DEPARTMENT OF STATE
BUREAU OF CORPORATIONS AND CHARITABLE ORGANIZATIONS**

Pennsylvania Department of State

-FILED-

☐ Return document by mail to:

Registered Agent Solutions, Inc.

Return documents by email to:

pa@rasi.com

Zip Code

Amendment of F
DSCE
(rev.

Amendment #: 0013857882

Date Filed: 5/20/2024



413

Read all instructions prior to completing. This form may be submitted online at <https://www.corporations.pa.gov/>.

Fee: \$250

In compliance with the requirements of the applicable provisions of 15 Pa.C.S. § 413 (relating to amendment of foreign registration statement), the undersigned registered foreign association hereby states that:

1. The name of the association under which it is registered to do business in this Commonwealth is:

New American Funding, LLC

2. The type of association is (check only one):

☐ Business Corporation

☐ Limited Partnership

☐ Business Trust

☐ Nonprofit Corporation

☐ Limited Liability (General) Partnership

☐ Professional Association

☒ Limited Liability Company

☐ Limited Liability Limited Partnership

3. The (a) address of the association's registered office in this Commonwealth or (b) name of its Commercial Registered Office Provider and the county of venue is:

Complete part (a) **OR** (b) – not both:

(a) _____
Number and street City State Zip County

OR

(b) c/o: Registered Agent Solutions, Inc. Dauphin
Name of Commercial Registered Office Provider County

4. Effective date of amendment of foreign registration (check, and if appropriate complete, one of the following):

☒ The Amendment of Foreign Registration shall be effective upon filing in the Department of State.

☐ The Amendment of Foreign Registration shall be effective on: _____ at _____
Date (MM/DD/YYYY) Hour (if any)

PA DEPT OF STATE

MAY 20 2024

2024-05-20 05:28:24 9:06 AM Received by Pennsylvania Department of State

DSCB:15-413 -2

5. Check, and if appropriate complete, one of the following:

- ☒ The association desires that its registration be amended to change or correct the following information:

The principal address is: 1 MacArthur Place, Suite 800, South Coast Metro, CA 92707

- ☐ The amendment adopted by the association is set forth in full in Exhibit A attached hereto and made a part hereof.

If the amendment reflects a change in name for the association which does not comply with 15 Pa.C.S. § 414 and §§ 201-209, the foreign association must adopt an alternate name that complies with 15 Pa.C.S. §§ 201-209 for use in Pennsylvania.

IN TESTIMONY WHEREOF, the undersigned association has caused this Amendment of Foreign Registration Statement to be signed by a duly authorized representative thereof this 10th day of May 2024.

New American Funding, LLC

Name of Association

/s/ Enrico Arvielo

Signature

Manager

Title

B8686-5244 05/28/2024 9:06 AM Received by Pennsylvania Department of State